

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

Crystal Long,)	
)	FILED UNDER SEAL
Plaintiff,)	
)	
v.)	Case No. 8:17-cv-01955-GJH
)	
Ability Recovery Services, LLC, et al.,)	
)	
Defendants.)	

**PENDRICK CAPITAL PARTNERS II, LLC'S MOTION FOR SUMMARY JUDGMENT
AND RESPONSE TO PLAINTIFF CRYSTAL LONG'S
MOTION FOR PARTIAL SUMMARY JUDGMENT**

NOW COMES defendant Pendrick Capital Partners II, LLC (“Pendrick”), and pursuant to Rule 56 of the Federal Rules of Civil Procedure, hereby files its Motion for Summary Judgment and accompanying Memorandum of Law, along with its Response to Plaintiff Crystal Long’s Motion for Partial Summary Judgment. In support, Pendrick states as follows:

Plaintiff brings the following claims in her lawsuit:

- (1) alleged violations of the Fair Credit Reporting Act, 15 U.S.C. § 1681, *et seq.*, (“FCRA”) against Ability Recovery Services, LLC (“Ability”), Experian Information Solutions, Inc. (“Experian”), and Equifax Information Services, LLC (“Equifax”);
- (2) for common law defamation against Ability, Experian, Equifax and Pendrick;
- (3) alleged violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*, (“FDCPA”) against Pendrick and Ability;
- (4) alleged violations of the Maryland Consumer Debt Collection Act, § 14-201 *et seq.*, (“MCDCA”) against Pendrick and Ability;
- (5) alleged violations of the Maryland Consumer Protection Act, § 13-301, *et seq.*, (“MCPA”) against Pendrick and Ability; and

(6) for declaratory relief against all defendants.

Plaintiff has moved for partial summary judgment on her FCRA claim against Ability and her FDCPA claim against Ability and Pendrick. For the reasons stated in greater detail in Pendrick's Memorandum of Law, plaintiff's motion for partial summary judgment must be denied, and Pendrick's Motion for Summary Judgment on all of plaintiff's claims against Pendrick asserted in the operative complaint should be granted.

WHEREFORE, Pendrick Capital Partners II, LLC respectfully requests that the Court find that there are no genuine issues of material fact, that Pendrick is entitled to judgment as a matter of law and, enter summary judgment in its favor on all claims.

Respectfully Submitted,

/s/ Morgan I. Marcus

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CERTIFICATE OF SERVICE

I hereby certify that on April 20, 2018, a copy of the foregoing was filed electronically in the ECF system. Notice of this filing will automatically be sent to the all parties of record by operation of the Court's electronic filing system.

/s/ Morgan I. Marcus